

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                     |   |                          |
|-------------------------------------|---|--------------------------|
| <b>IN RE:</b>                       | § | <b>CASE NO. 25-30155</b> |
|                                     | § |                          |
| <b>ALLIANCE FARM AND RANCH, LLC</b> | § |                          |
|                                     | § |                          |
| <b>DEBTOR.</b>                      | § | <b>(CHAPTER 11)</b>      |
|                                     | § |                          |

**DEBTOR’S OBJECTION TO THE OSTRANDERS’  
EMERGENCY MOTION TO DISMISS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Alliance Farm and Ranch, LLC (the “Debtor”) files this *Objection to The Ostranders’ Motion to Dismiss*, and in support hereof, respectfully states as follows:

**A. The Ostranders Lack Standing**

1. The Ostranders assert that its foreclosure of the 5450 Honea Egypt Rd. property (the “Property”) occurred on January 7, 2025 at 10:15 a.m. This bankruptcy case was filed on January 7, 2025 at 10:40 a.m. The Debtor does not dispute that the automatic stay does not apply to the foreclosure. There is also no dispute that the Ostranders hold no unsecured deficiency claim in this bankruptcy case since the amount they bid-in in at the foreclosure matched or exceeded the amount owed by the Debtor. The Ostranders’ only role in this case is as the defendant in litigation brought by the Debtor. As such, the Ostranders have no stake in this case and lack standing to assert their dismissal motion. See *In re Odin Demolition & Asset Recovery, LLC*, 544 B.R. 615, 625 (Bankr. S.D. Tex. 2016) and the cases cited therein.

**B. Dismissal of Case**

2. The Ostranders assert that this case should be dismissed since “there is nothing to liquidate or reorganize.” This is incorrect. The Debtor has claims against the Ostranders that, if

successfully prosecuted, would go to pay its creditors including the claim of its affiliate Alliance Energy Partners, Inc. (“Energy”) in the amount of \$1 million.

3. Courts have held that the fact that a debtor has no physical assets or ongoing business activities does not mean that it has no realistic prospects for proposing a plan of reorganization. *In re Toyota of Yonkers, Inc.*, 135 B.R. 471, 476 (Bankr. S.D.N.Y. 1992). Further, there is no requirement in the Bankruptcy Code that a debtor must prove that a plan is confirmable in order to file a petition. *In re Gen. Growth Props.*, 409 B.R. 43, 65 (Bankr. S.D.N.Y. 2009).

4. Dismissal of this case would harm the creditors of both the Debtor and Energy. Energy’s claim against the Debtor may be the only asset it has to pay its creditors. As such, there is a compelling reason to maintain this case.

WHEREFORE, the Debtor respectfully prays that this Court deny the Motion to Dismiss the case; and grant the Debtor such other and further relief as this Court may deem just and proper.

Dated: April 7, 2025.

**OKIN ADAMS BARTLETT CURRY LLP**

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**PROPOSED COUNSEL FOR ALLIANCE  
FARM AND RANCH, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2025, a true and correct copy of the foregoing Objection was served via the Court's CM/ECF system and by United States First Class Mail to the parties listed below and to the parties listed on the attached service lists.

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Timothy L. Wentworth

Label Matrix for local noticing

0541-4

Case 25-30155

Southern District of Texas

Houston

Mon Apr 7 14:22:35 CDT 2025

Alliance Energy Partners, LLC

20008 Champions Forest Dr., Suite 1203

Spring, TX 77379-8697

ALLIANCE FARM AND RANCH, LLC

5450 Honea Egypt Rd

Montgomery, TX 77316-2364

Alliance Energy Partners, LLC

5450 Honea Egypt Rd

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4

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End of Label Matrix

Mailable recipients 12

Bypassed recipients 3

Total 15

Label Matrix for local noticing  
0541-4  
Case 25-31937  
Southern District of Texas  
Houston  
Mon Apr 7 16:52:03 CDT 2025

405 Technology Solutions  
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ASAP Thread Protectors  
Jose Carrasco  
Houston, TX 77066

Alliance Drilling Tools, LLC  
PO Box 1503  
Evanston, WY 82931-1503

Arrington Directional LLC  
Camp Arrington  
2029 Eagle View Dr.  
Navasota, TX 77868-3951

Big H Transport LLC  
PO Box 215  
Dobbin, TX 77333-0215

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16516 El Camino Real, Suite 406  
Houston, TX 77062-5723

Conroe Welding Supply Inc  
415 South Frazier  
Conroe, TX 77301-5098

DIG  
PO Box 916  
Broussard, LA 70518-0916

Downhole Works LLC  
28723 Shirley Court  
Magnolia, TX 77355-5613

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ADM Machine Shop  
14217 HWY TX-105  
Conroe, TX 77306-5356

Adobe Oilfield Services, Ltd  
705 W. Hillmont  
Odessa, TX 79764-1931

Alliance Farm and Ranch  
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Bench Tree Rentals, LLC  
2933 E. Davis  
Conroe, TX 77301-7216

Black Diamond  
15425 North Freeway Suite 350  
Houston, TX 77090-6016

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The Woodlands, TX 77380-2402

DAC Electrical Services, LLC  
7926 Adcock Acres Dr.  
Conroe, TX 77303-4014

Directional Manufacturing and Supply  
1098 Marcon Dr  
Lafayette, LA 70507

Drakewell LLC  
3324 NW 135TH ST  
Oklahoma City, OK 73120-4054

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Midland, TX 79701-6531

All-American Trucking  
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Houston, TX 77277-0568

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REME Technologies dba Arcotech  
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Broussard, LA 70518-0916

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Lugenbuhl, Wheaton, Peck, Rankin  
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New Orleans, LA 70130-6041

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Houston, TX 77090-6016

Cavare Inc  
Bill Beattie  
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Conroe, TX 77301-6104

DAVM, LLC  
12419 Bagwell Rd  
Willis, TX 77378-4705

Discovery Downhole Services  
1855 Skyview Dr.  
Casper, WY 82601-9641

Dril Tech, LLC  
PO Box 622039  
Dallas, TX 75262-2039

Drilling Tools International  
1514 South County Road 1309  
Midland, TX 79707-5839

Dura Coatings  
13920 South Meridian  
Oklahoma City, OK 73173-8804

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Katy, TX 77493-3598

Dyna-Drill Technologies LLC  
23400 Colonial Parkway  
Katy, TX 77493-3598

DynoMax Drilling Tools USA, Inc.  
2830 Farrell Road  
Houston, TX 77073-4106

FT Machine LLC  
820 Turney Dr  
Houston, TX 77038-3922

Ferretville Investments LLC  
20008 Champion Forest Dr., Suite 1204  
Spring, TX 77379-8697

Gator Technologies  
2017 Traders Ridge Drive  
Conroe, TX 77301-2153

GeoGuidance Drilling Services  
P.O. Box 42647  
Bakersfield, CA 93384-2647

Gordon Technologies LLC  
PO Box 1486  
Scott, LA 70583-1486

IAE International, Inc. d/b/a Sniper  
13300 Stonefield Dr.  
Houston, TX 77014-2923

IMECH - Innovative Mech. Solutions, LLC  
2418 Greens Rd  
Houston, TX 77032-1332

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Houston, TX 77215-0391

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Casper, WY 82602-1608

Platinum Transport Service  
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Spring, TX 77386-2926

Pmax Energy Services Inc  
16655-2 Telge Road  
Cypress, TX 77429-1387

Rig Runner  
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The Woodlands, TX 77380

Schumacher-Dixie, LLC  
5610 Polk Street  
Houston, TX 77023-2106

Spira Systems Inc  
16518 Aldine Westfield Road Suite A  
Houston, TX 77032-1363

Steel River Manufacturing LLC  
18300 Strack Drive Suite 800  
Spring, TX 77379-8798

Surface Resistance Technologies LLC  
2998 Old Highway 105 E  
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